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November 30, 2005

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: VoIP 911 Compliance Letter (WC Docket No. 05-196)

Dear Ms. Dortch:

Pursuant to the *VoIP 911 Order*, 20 FCC Rcd at 10273, ¶ 50; 47 C.F.R. § 9.5(f), issued by the Federal Communications Commissions ("FCC"), I hereby submit on behalf of TelCove, Inc. and its operating subsidiaries the following Compliance Letter, detailed according to the criteria set forth in the Public Noticed issued pursuant thereto.

1. 911 Solution: This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*. Further, the detailed description of the technical solution should include the following components:

Please be advised that with regard to fixed location VoIP end users, TelCove is 100% compliant with the 911 service rules. Please note that nomadic use is addressed as part of the technical solution discussion provided below:

- 911 Routing Information/Connectivity to Wireline E911 Network: A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized." If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a

detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.

TelCove is a facilities-based provider and has direct trunking into selective routers and/or PSAPs for our entire footprint of 70 markets.

- Transmission of ANI and Registered Location Information: A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.

TelCove transmits ANI information to all capable locations. All answering points to which this information is transmitted are capable of receiving and processing ANI information.

- 911 Coverage: To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

As stated above, TelCove is compliant in fixed location use in all 70 of its markets.

2. Obtaining Initial Registered Location Information: A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of

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contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

TelCove collects this information during the ordering of service and creates an ALI record with the name and address of the customer, as well as the ANI.

3. Obtaining Updated Registered Location Information: A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

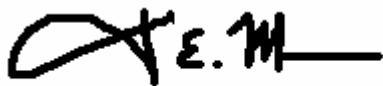
For fixed location users, records are updated at the time the customer requests a change in service address.

4. Technical Solution for Nomadic Subscribers: A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

TelCove is currently under discussions with several companies regarding a solution for nomadic use, but note that those discussions are restricted due to confidentiality issues. In addition to the foregoing, to the extent an automatic detection mechanism that enables the provider to identify when a customer may have moved his or her interconnected VoIP service to a new location and ensure that the customer continues to receive 911 service even when using the interconnected VoIP service nomadically is created, TelCove will evaluate the integration of such a device to its operations. TelCove is not aware of the existence of such capability as of the date of this letter.

Please let me know if you have additional questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "J.E. Means", followed by a horizontal line.

James E. Means
Vice President & General Counsel

cc: Ms. Kathy Berthot, Deputy Chief, Spectrum Enforcement Division,
Enforcement Bureau (kathy.berthot@fcc.gov)

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Ms. Janice Myles, Competition Policy Division, Wireline Competition Bureau
(janice.myles@fcc.gov)

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